

PATENT
450100-02164**REMARKS**

The Office Action in the above-identified application has been carefully considered and this Amendment has been presented to place this application in condition for allowance. Accordingly, reexamination and reconsideration of this application are respectfully requested.

Claims 21 and 22 are currently pending. Claims 1-20 have been canceled, without prejudice or disclaimer of subject matter. New claims 21 and 22 have been added. No new matter has been introduced into this application. It is submitted that these claims, are patentably distinct over the prior art cited by the Examiner, and that these claims are in full compliance with the requirements of 35 U.S.C. §112.

Claims 1-18 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Morioka (U.S. Patent No. 6,324,334) in view of Pont (U.S. Patent No. 6,014,170), Lubbers (U.S. Patent No. 5,774,643), and Bealkowski (U.S. Patent No. 5,926,075). Claim 19 was rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Morioka in view of Pont, Lubbers, "Rossi" and Bertram (U.S. Patent No. 6,011,546). Applicants respectfully assume that the Examiner meant "Bealkowski" instead of "Rossi". The present invention is patentable over these references for at least the following reasons.

The present invention requires "integral mixing means for internally superimposing said bit map data on said audio-visual data within said video server" (claims 21 and 22). To meet this limitation, the Examiner combines the video server disclosed in Morioka

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with the cameras disclosed in Pont which superimposes text onto still images. However, this is simply the same as the prior art distinguished in the Background section: “the conventional video server does not have a signal processing function of superimposing bit map data upon video signals, and such signal processing is performed using a special apparatus (mixer).” (pg. 2, lin. 10-14). As stated in the Background, the objective of the invention is to internally combine a video-server with an integral mixer. Hence, Morioka and Pont simply reflect the prior art distinguished by the Applicants as being a non-obvious combination, and therefore this rejection should be withdrawn.

The present invention also requires “interface means for receiving bit map data, a control program, and setting data externally supplied from a network or a memory card” (claims 21 and 22). As shown in Figure 3, the present invention has Memory Card Interface 63 and Ethernet Interface 64 for receiving external bit-map data D12, a control program D13, and setting data D14. The Examiner relies on Morioka for disclosing the interface means: “auxiliary/text data which is mixed-in with the video and sound signals to make up the hybrid data signal” (col. 7, lin. 41 to col. 8, lin. 44, col. 9, lin. 1-49, and col. 18, lin. 1-7). However, the interfaces of Morioka are used to receive hybrid data signals, and not bit map data to be superimposed by the device. Accordingly, Morioka does not disclose an interface means for receiving bit map data externally supplied from a network or a memory card. The Examiner asserts Morioka’s “keyboard 18” meets the present limitations of externally receiving a control program and setting data (Office Action, pg. 9 and pg. 11, referring to Fig. 4; col. 10, lin. 53-5” of Morioka). However, the keyboard (18) of Morioka is used to receive external input from a user, not a control program and setting data externally supplied from a network or memory card.

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Accordingly, Morioka fails to meet the interface means for receiving bit map data, a control program, and setting data externally supplied from a network or a memory card limitation recited in the present claims.

Therefore, for at least these reasons, Morioka, Pont, Lubbers, Bealkowski, and Bertram fail to meet the limitations of the present invention and the new claims should now be allowed.

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. Early and favorable reconsideration of the application are respectfully requested.

No additional fees are deemed to be required for the filing of this amendment, but if such are required, the Examiner is hereby authorized to charge any insufficient fees or credit any overpayment associated with the above-identified application to Deposit Account No. 50-0320.

If any issues remain, or if the Examiner has any further suggestions, he/she is invited to call the undersigned at the telephone number provided below. The Examiner's consideration of this matter is gratefully acknowledged.

Respectfully submitted,
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